

IGT UNC
IGTUNC@gemserv.com

12 May 2020

Dear Sir or Madam,

Re: IGT143 Use of the Isolation Flag to identify sites with abnormal load reduction during COVID-19 period

Thank you for the opportunity to provide representation on the above noted Modification Proposal. Please find below Northern Gas Network's (NGN) comments in respect of this change.

NGN supports this Modification Proposal.

We support this proposal as it should further Relevant Objective a) *Efficient and economic operation of the pipe-pine system* by redressing some of the economic impacts experienced due to a change in gas usage caused by COVID-19 impacts and ensure consistency with Large Transporter sites. The introduction of a temporary use for the isolation flag to allow Pipeline Users to deem as isolated sites that have ceased usage or are only using de minimis amounts, due to the restrictions in place during the COVID-19 period, should prevent these sites from receiving energy allocation and the corresponding LDZ commodity charge whilst the deemed isolation is in place.

This proposal should also further Relevant Objective d) *Securing of effective competition* by ensuring that gas allocations are more accurately apportioned across Supply Meter Points which are actively consuming gas during the COVID-19 period.

I hope these comments will be of assistance and please contact me should you require any further information in respect of this response.

Yours sincerely,

Tracey Saunders (via email)
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